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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE: DAVID DARNELL BRITT	§	CASE NO. 19-42383-BTR
PANDORA HENDERSON BRITT	§	
Debtor(s),	§	CHAPTER 13
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BMO HARRIS BANK		
	§	
Movant	§	
v.	§	
DAVID AND PANDORA BRITT	§	
Respondent(s)	§	

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

TO THE HONORABLE JUDGE BRENDA T. RHOADES:

COMES NOW, David and Pandora Britt (hereinafter "Debtor(s)") with this Answer to Motion for Relief from Automatic Stay filed by BMO Harris Bank ("Movant"), and in support thereof would respectfully show the Court as follows:

1. The Debtor(s) admit the allegations contained in paragraph 1 of Movant's Motion for Relief from Automatic Stay (the "Motion").
2. The Debtor(s) admit the allegations contained in paragraph 2 of the Motion.
3. The Debtor(s) deny the allegations contained in paragraph 3 of the Motion.
4. Debtor(s) admits the allegations contained in paragraph 4 of the Motion.
5. Debtors deny the allegations contained in paragraph 5 of the Motion.
6. Debtors deny the allegations contained in paragraph 6 of the Motion.
7. Debtor(s) deny the allegations contained in paragraph 7 of the Motion.
8. Debtor(s) deny the allegations contained in paragraph 8 of the Motion.
9. Debtor(s) deny the allegations contained in paragraph 9 of the Motion.

10. Debtor(s) deny the allegations contained in paragraphs 10, 11 and 12 of the Motion.

11. Anything not specifically admitted herein is hereby denied.

WHEREFORE, PREMISES CONSIDERED, Debtor(s) respectfully requests that the Court deny the relief requested in the Motion and allow the automatic stay to continue pursuant to Section 362 of the Bankruptcy Code.

DATED: 12/4/19

Respectfully submitted,

RUBIN & ASSOCIATES, P.C.

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(214) 760-7777

By: /s/ Mark S. Rubin

Mark S. Rubin

State Bar No. 17361550

ATTORNEYS FOR DEBTOR(S)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via CM ECF E-mail and/or via first class United States mail, postage prepaid to the following:

Carey Ebert, Chapter 13 Trustee
PO Box 941166
Plano, Texas 75094-1166

William T. Neary, U.S. Trustee
110 North College Street, Suite 300
Tyler, TX 75702

Ammar Dadabhoy
77 Sugar Creek Center Blvd, Suite 401
Sugarland, Texas 77478

DATED: 12/4/19

/s/ Mark S. Rubin

One of Counsel